

**United States Bankruptcy Court  
Middle District of Pennsylvania**

In re:

Vincent Graham,

Debtor.

Case No. 23-00162-MJC

Chapter 13

Related to ECF No. 61

**Debtor's Objection to Motion for Relief from Stay filed by U.S. Bank**

**AND NOW**, Debtor Vincent Graham, by and through his attorney, hereby objects to the Motion for Relief from Stay filed by U.S. Bank. Because U.S. Bank's interest in the property is adequately protected by an equity cushion, no grounds for relief exist and the motion must be denied.

**NOW, THEREFORE**, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in his favor as may be necessary and proper under the law.

Date: March 17, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By: /s/ MICHAEL A. CIBIK  
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**Certificate of Service**

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by U.S. Bank to be served on all parties on the clerk's service list through the CM/ECF system.

Date: March 17, 2024

/s/ MICHAEL A. CIBIK  
Michael A. Cibik

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

In re:

Vincent Graham,

Debtor.

Case No. 23-00162-MJC

Chapter 13

Related to ECF No. 61

**Order Denying Motion for Relief from Stay filed by U.S. Bank**

**AND NOW**, upon consideration of the Motion for Relief from Stay filed by U.S. Bank, and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.